

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

RYAN SCOVILLE

Plaintiff,

v.

U.S. DEPARTMENT OF STATE,

Defendant.

Case No. 2:22-cv-00091-NJ

**JOINT CIVIL L.R. 7(H) EXPEDITED NON-DISPOSITIVE
MOTION TO AMEND SCHEDULING ORDER**

The Parties respectfully seek non-dispositive relief through this expedited motion brought pursuant to Civil Local Rule 7(h). The Parties jointly request the Court to amend the Scheduling Order (Doc. 53) to extend the current deadlines as set forth below. Good cause exists to facilitate the parties' efficient preparation and presentation of information to the Court and to align with the academic schedule to enhance the ability of student counsel to participate in the substantive work on the case.

THE PARTIES HEREBY STIPULATE AND AGREE, subject to the approval of the COURT, to amend the Scheduling Order (Doc. 53) as follows:

Event	Current Deadline	Proposed Deadline
Deadline to Disclose Expert Designations and for Exchange of Expert Reports	September 9, 2024	October 4, 2024
Deadline to Disclose Rebuttal Expert Designations and for Exchange of Rebuttal Expert Reports	October 7, 2024	November 12, 2024
Deadline to Complete Expert Discovery	October 31, 2024	December 13, 2024
Plaintiff's Motion for Summary Judgment	November 22, 2024	February 3, 2025
Deadline for any <i>Daubert</i> Motions	November 22, 2024	February 3, 2025

Event	Current Deadline	Proposed Deadline
Defendant's Cross-motion for Summary Judgment and Opposition to Plaintiff's Motion for Summary Judgment	January 6, 2025	March 21, 2025
Responses to any <i>Daubert</i> Motions	January 6, 2025	March 21, 2025
Plaintiff's Reply in Support of Plaintiff's Motion for Summary Judgment and Opposition to Defendant's Cross-motion for Summary Judgment	February 3, 2025	April 18, 2025
Replies in support of any <i>Daubert</i> Motions	February 3, 2025	April 18, 2025
Defendant's Reply in Support of Defendant's Cross-motion for Summary Judgment	March 3, 2025	May 16, 2025

For good cause shown, the Parties respectfully request that the Court amend the Scheduling Order as proposed herein.

Dated: September 5, 2024

/s/ Brady C. Williamson

Brady C. Williamson
GODFREY & KAHN, S.C.
State Bar No. 1013896
One East Main Street, Suite 500
Madison, WI 53703
Tel: (608) 257-3911
bwilliam@gklaw.com

Respectfully submitted,

/s/ Tobin Raju

Tobin Raju, No. 5638523
MEDIA FREEDOM & INFORMATION
ACCESS CLINIC
YALE LAW SCHOOL
P.O. Box. 208215
New Haven, CT 06520
Tel: (203) 436-5836
tobin.raju@YLSCLinics.org

Counsel for Plaintiff

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

MARCIA BERMAN
Assistant Director, Federal Programs Branch

s/Christopher M. Lynch
(D.C. Bar No. 1049152)
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch

1100 L St. NW
Washington, DC 20005
(202) 353-4537 (phone)
(202) 616-8470 (fax)
christopher.m.lynch@usdoj.gov

Counsel for Defendant